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WOODWARD, COTHRAN & HERNDON

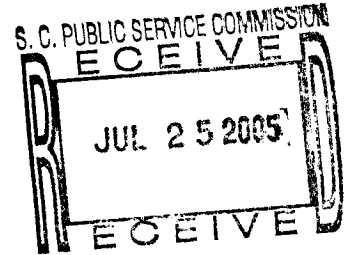
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EDWARD M. WOODWARD, SR.
(1921-2000)


July 20, 2005



The Honorable Charles L. A. Terreni
Executive Director
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, SC 29211

Re: Petition of MCImetro Access Transmission Services, LLC for Arbitration with Horry Telephone Company, under the Telecommunications Act of 1996
Case No. 2005-188-C
Our File No. 05-7024

Dear Mr. Terreni:

 Pursuant to Public Service Commission Regulation 103-851 and 103-854, attached for filing are MCI's Interrogatories and Requests to Produce to Horry Telephone Company.

Very truly yours,

WOODWARD, COTHRAN & HERNDON

Darra W. Cothran
dwcothran@wchlaw.com

DWC/bjd

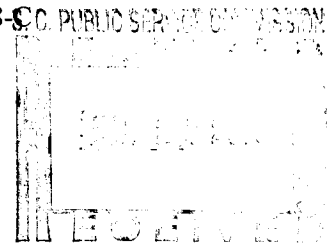
Enclosure.

cc: F. David Butler, Esquire
John M. Bowen, Jr., Esquire
Shannon Bowyer Hudson, Esquire
Margaret M. Fox, Esquire
Wendy B. Cartledge, Esquire
Frank R. Ellerbe, III, Esquire
Curley P. Huggins, CEO, Horry Telephone Cooperative, Inc.
Kennard B. Woods, Esquire

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

In Re: Petition of MCImetro Access Transmission)
Services, LLC for Arbitration of Certain Terms)
and Conditions of Proposed Agreement with)
Horry Telephone Company, Concerning)
Interconnection and Resale under the)
Telecommunications Act of 1996)

Case No. 2005-188-S.C. PUBLIC SERVICE COMMISSION



**INTERROGATORIES AND REQUEST TO PRODUCE
TO HORRY TELEPHONE COMPANY**

Pursuant to Public Service Commission Regulations 103-851 and 103-854, MCI hereby requests the answers to Interrogatories and response to the Request for Production of documents herein within thirty (30) days after the service or not less than five (5) days before Rebuttal Testimony is due. MCI requests that any objections to the discovery requests be communicated to MCI within ten (10) days of service.

INTERROGATORIES

1. Does Horry Telephone Company, or any affiliate or subsidiary of Horry Telephone Company, provides services that utilize Voice-over-Internet Protocol? If so, please describe the services, the entity providing such services, and the class or classes of customers to whom such services are provided.

2. Please list the names and addresses of all Horry Telephone Company affiliates, subsidiaries, spin-offs or related companies.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. In addition to your response to Interrogatory number 1 above, please produce all contracts or agreements pursuant to which Horry Telephone Company, or an affiliate or subsidiary of Horry Telephone Company, provides Voice-over-Internet Protocol services to customers, as well as any marketing, advertising, or sales documents describing such services.

2. Please produce all contracts and/or agreements (the provisions of which are in effect) with any entity with which Horry Telephone Company, or an affiliate or subsidiary of Horry Telephone Company, exchanges telecommunications service, information service, enhanced services and/or Voice-over-Internet Protocol traffic. For any such contracts or agreements that are filed with and are publicly available at the South Carolina Public Service Commission, please identify the same by providing the names of the parties, the docket numbers, date(s) of filing and, if applicable, the date(s) of Commission approval thereof.

These Interrogatories and Request to Produce shall be deemed continuing from the time of service until the time of the trial of the case.

RESPECTFULLY SUBMITTED, this 20th day of July, 2005.

By: Darra W. Cothran

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Woodward, Cothran & Herndon
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MCI Law and Public Policy
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CERTIFICATE OF SERVICE

I, Betty J. DeHart of Woodward, Cothran & Herndon, Attorneys for MCI, Inc., do hereby certify that I have served a copy of the Interrogatories and Request to Produce to Horry Telephone Company under the Telecommunications Act of 1996 by causing to be deposited in a United States Postal Service mailbox copies of the same, postage prepaid, addressed to the persons indicated below.

F. David Butler, Esquire
The Public Service Commission
State of South Carolina
Post Office Drawer 11649
Columbia, S.C. 29211

John M. Bowen, Jr., Esquire
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, S.C. 29211

Curley P. Huggins, Chief Executive Officer
Horry Telephone Cooperative, Inc.
Post Office Box 1820
Conway, SC, 29528

Florence P. Belser, Esquire
South Carolina Public Service Commission
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, S.C. 29201

Shannon Bowyer Hudson, Esquire
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Columbia, S.C. 29201

Frank R. Ellerbe, III, Esquire
Robinson, McFadden & Moore, P..
Post Office Box 944
Columbia, S.C. 29202

Betty J. DeHart
Betty J. DeHart

SWORN to before me this

20th day of JULY, 2005.

[Signature] (L.S.)

Notary Public for South Carolina

My Commission Expires: 4/14/07